

February 11, 2011

Office of Waste Programs Enforcement  
RCRA Enforcement Division (OS-520)  
Environmental Protection Agency  
USEPA Ariel Rios (5101)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

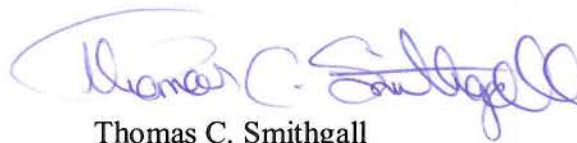
Subject: 2010 Hazardous Waste Export Report

Dear Sir or Madam:

Enclosed is the EPA Annual Report of Hazardous Waste Exports for the Kodak Park Division of Eastman Kodak Company. This submission covers exports of hazardous waste made during the calendar year 2010.

If any further information is required, please contact Ari Cheremeteff at (585) 477-9551 or email at [ariadna.cheremeteff@kodak.com](mailto:ariadna.cheremeteff@kodak.com).

Sincerely,



Thomas C. Smithgall  
Health, Safety and Environment  
Eastman Kodak Company

TCS/AC:  
Enclosure

received  
SDH 3/1/11

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ANNUAL EXPORT REPORT 2010

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(585) 477-9551

EASTMAN KODAK COMPANY

1669 LAKE AVE

ROCHESTER

NY 14652

DELIVERY TO

RCRA ENFORCEMENT DIVISION (OS-520) 569-503

USEPA - AIRL RIOS (5101)

1200 PENNSYLVANIA AVE N.W.

WASHINGTON DC. 20004

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**ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2010**

**1. Legal Name and Mailing Address:**

**Name:** Eastman Kodak Company  
**EPA ID:** NYD980592497  
**Mailing Address:** 1669 Lake Avenue  
Building 56, Floor 5  
Rochester, New York 14652-4543

**2. Date and State of Incorporation:**

01/01/1881  
New York

**3. Name and Address of the Registered Agent:**

Eastman Kodak Company  
1669 Lake Avenue  
Rochester, New York 14652-3509

**4. Name and Mailing Address of Each Foreign Facility to which Eastman Kodak Company Exported Hazardous Waste During the 2010 Calendar Year:**

**CONSIGNEE #1**

**Name:** Xstrata Canada Corporation  
**EPA ID:** FC0CANADA001  
**Address:** Horne Smelter  
156 Marcel-Baril Avenue  
Rouyn-Noranda  
Canada, QC J9X 7C1

**CONSIGNEE #2**

**Name:** Xstrata Canada Corporation  
**EPA ID:** FC0CANADA004  
**Address:** Brunswick Smelter  
692 Main Street  
Belledune, New Brunswick  
Canada, E8G 2M1

**TRANSPORTER #1**

**Name:** Laidlaw Carriers Tank GP, Inc.  
**EPA ID:** MIK918959883

**TRANSPORTER #2**

**Name:** Laidlaw Carriers Bulk GP, Inc.  
**EPA ID:** MIK621327675

**TRANSPORTER #3**

**Name:** Tonawanda Transport, Inc.  
**EPA ID:** NYD097644801

**TRANSPORTER #4:**

**Name:** Hazmat Environmental Group, Inc.  
**EPA ID:** NYD980769947

**5. Copies of EPA Acknowledgement of Consent Documents are Included in Attachments 1 and 2.****6. Annual Reports for 2010:****WASTE/SHIPPING INFORMATION:****A) WASTE STREAM #1:****Description of Waste: Ash Dried Wastewater Treatment Sludge**

**EPA Waste Codes:** F001, F002, F004, F005, F006, F007, F008, F009, F011, F012, F019, F039, K156, K157, K158, K159, U003, U004, U006, U007, U009, U011, U012, U014, U017, U018, U019, U021, U022, U028, U037, U039, U041, U043, U044, U047, U048, U050, U052, U053, U061, U063, U066, U067, U068, U069, U070, U071, U072, U075, U076, U077, U078, U079, U080, U081, U083, U088, U091, U093, U094, U095, U098, U101, U102, U103, U107, U108, U115, U118, U119, U120, U122, U123, U128, U129, U130, U131, U133, U136, U138, U140, U141, U147, U148, U149, U152, U153, U156, U157, U159, U160, U162, U165, U166, U167, U168, U169, U170, U171, U182, U185, U187, U188, U190, U191, U193, U194, U196, U197, U200, U201, U202, U208, U209, U210, U211, U218, U219, U220, U221, U223, U225, U226, U227, U228, U236, U244, U246, U278, U279, U328, U353, U359, U404.

**DOT Shipping Name:** Waste Environmentally Hazardous Substances, Solid, N.O.S., 9, UN3077, III, RQ, F001, F002, F004, F005, F006, F007, F008, F009, F011, F012, F019, F039, K156, K157, K158, K159, U003, U004, U006, U007, U009, U011, U012, U014, U017, U018, U019, U021, U022, U028, U037, U039, U041, U043, U044, U047, U048, U050, U052, U053, U061, U063, U066, U067, U068, U069, U070, U071, U072, U075, U076, U077, U078, U079, U080, U081, U083, U088, U091, U093, U094, U095, U098, U101, U102, U103, U107, U108, U115, U118, U119, U120, U122, U123, U128, U129, U130, U131, U133, U136, U138, U140, U141, U147, U148, U149, U152, U153, U156, U157, U159, U160, U162, U165, U166, U167, U168, U169, U170, U171, U182, U185, U187, U188, U190, U191, U193, U194, U196, U197, U200, U201, U202, U208, U209, U210, U211, U218, U219, U220, U221, U223, U225, U226, U227, U228, U236, U244, U246, U278, U279, U328, U353, U359, U404.

**DOT Hazard Class:** "9"

**DOT ID Code (UN.NA):** UN3077

**Number of Shipments during the calendar year 2010: 17**  
**Total Volume of this Waste Shipped: 398 tons**

**B) WASTE STREAM #2:**

**Description of Waste:** Waste Refractory Brick  
**EPA Waste Code:** D007

**DOT Shipping Name:** Waste Environmentally Hazardous Substances, Solid,  
N.O.S., 9, UN3077, III, RQ (D007)  
**DOT Hazard Class:** "9"  
**DOT ID Code (UN.NA):** UN3077

**Number of Shipments during the calendar year 2010: 15**  
**Total Volume of this Waste Shipped: 427**

**WASTE MINIMAZATION ACTIVITIES (Attachment 3)**

☐ Not Required  
☐ Submitted with EPA Biennial Report  
☒ Attached

**CERTIFICATION**

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware there are possible penalties for submitting false information including the possibility of fine and imprisonment.

**Signed:** Arlene M. Liberti **Date:** February 24, 2011

## **Attachment 1:**

**Copy of EPA Acknowledgement of Consent  
Documents for Ash from Wastewater Treatment  
Sludge Incineration**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

February 16, 2010

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

EPA Notice No.:664/09

THOMAS C. SMITHGALL  
EASTMAN KODAK COMPANY  
1669 LAKE AVENUE  
BLDG. 320, 1ST FLOOR.  
ROCHESTER, NY 14652-6259  
EPA I.D. No.: NYD980592497

Dear THOMAS C. SMITHGALL:

This is to acknowledge receipt of your notice, dated December 21, 2009, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice:

**Waste Stream 1: ASH FROM WASTEWATER TREATMENT SLUDGE INCINERATION**

Waste Description: ASH FROM WASTEWATER TREATMENT SLUDGE INCINERATION  
EPA Waste Code: SEE ATTACHMENT  
DOT Shipping Name: WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID,  
N.O.S.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 1000 Tons  
Estimated Frequency: 50 loads per Year

You may ship this waste to the following consignee:

XSTRATA CANADA CORPORATION  
HORNE SMELTER  
156 MARCEL-BARIL AVENUE  
ROUYN-NORANDA J9X 7C1  
NC0000000413

**YOUR NOTIFICATION OF INTENT TO EXPORT ON WHICH THIS CONSENT IS BASED LISTED NUMEROUS EPA WASTE NUMBERS (SEE ATTACHMENT A). THIS ATTACHMENT IS INCORPORATED INTO THIS CONSENT BY REFERENCE AND MUST BE ATTACHED TO THE CONSENT COPY ACCOMPANYING EACH SHIPMENT. ONLY WASTES WITH EPA CODES INCLUDED IN THE NOTICE OF INTENT TO EXPORT AND SPECIFICALLY CONSENTED TO BY CANADA MAY BE EXPORTED.**

Shipments may occur during the period from February 08, 2010 to February 07, 2011.

You are also reminded of the following **special RCRA requirements for export shipments of hazardous waste**. Specific details of these requirements are contained in Title 40 of the Code of Federal Regulations, Part 262, Subpart E.

1. If the major terms of the original notice of intent to export on which this consent is based should change, you must renotify EPA. Please mail your renotification to: USEPA, Ariel Rios Building, Mail Code 2254A, 1200 Pennsylvania Avenue, NW, Washington, D.C. **20460**, with "ATTENTION: INTERNATIONAL COMPLIANCE ASSURANCE DIVISION" prominently displayed on the front of the envelope. (262.53(c)). Alternately, notices may be sent by courier to the same office at the Ariel Rios Building, Room 6144, 1200 Pennsylvania Avenue, NW, Washington, DC 20004.
2. The Uniform Hazardous Waste **Manifest** Form for each shipment must identify the **point of departure** from the United States in Item 15, Special Handling Instructions. (262.54(c))
3. The following statement must be added to the end of the first sentence of the **certification** set forth in Item 16 of the Uniform Hazardous Waste Manifest Form: "and conforms to the terms of the attached EPA Acknowledgment of Consent". (262.54(d))
4. A **copy** of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (262.54(h))
5. You must provide the waste transporter with an additional copy of the U.S. hazardous waste manifest accompanying the shipment for delivery to a **U.S. Customs** official at the point the hazardous waste leaves the United States in accordance with 263.20(g)(4) and (262.54(i)).

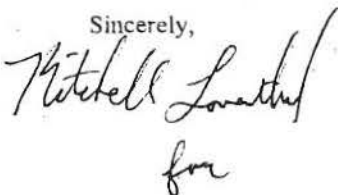
6. You must file an **exception report** with the USEPA, Ariel Rios Building, Mail Code 2254A, 1200 Pennsylvania Avenue, NW, Washington, DC **20460**, ATTN: INTERNATIONAL COMPLIANCE ASSURANCE DIVISION, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; or if the waste is returned to the United States. (262.55). Alternately, exception reports may be sent by courier to the same office at the Ariel Rios Building, Room 6144, 1200 Pennsylvania Avenue, NW, Washington, DC **20004**.

7. You must file an **annual report** by March 1 of each year with the USEPA, Ariel Rios Building, Mail Code 2254A, 1200 Pennsylvania Avenue, NW, Washington, DC **20460**, ATTN: INTERNATIONAL COMPLIANCE ASSURANCE DIVISION, summarizing all hazardous waste shipments exported during the previous calendar year. The report must include all items listed in 262.56. Alternately, annual reports may be sent by courier to the same office at the Ariel Rios Building, Room 6144, 1200 Pennsylvania Avenue, NW, Washington, DC **20004**.

All shipments of hazardous waste must conform to all applicable State and Federal hazardous waste regulations and transportation requirements as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Mrs. Jean Shaw (Phone 202/564-7111), or Mr. Mitchell Lowenthal (Phone 202/564-2060), EPA, Office of Enforcement and Compliance Assurance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mitchell Lowenthal".

for

Robert G. Heiss, Director  
International Compliance Assurance Division  
Office of Federal Activities (2254A)

(664/09)

## ATTACHMENT A

Page 1 of 4

### EPA WASTE

#### CODE

#### HAZARDOUS WASTE CONSTITUENTS

- F001 Spent halogenated solvents used in degreasing: Tetrachloroethylene, Trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons.
- F002 Spent halogenated solvents: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloroethane, 1,2,2-trichloroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane.
- F004 Spent Non-Halogenated Solvents: Cresols, cresylic acid, and nitrobenzene.
- F005 Spent Non-Halogenated Solvents: Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and nitropropane.
- F006 Wastewater treatment sludges from electroplating operations.
- F007 Spent cyanide plating bath solutions from electroplating operations.
- F008 Plating Bath Residues from the bottom of plating baths from electroplating operations where cyanides are used in the process.
- F009 Spent stripping and cleaning bath solutions from electroplating operations in which cyanides are used in the process.
- F010 Quenching bath residues from oil baths from metal heat treating operations in which cyanides are used in the process.
- F011 Spent Cyanide Solutions from salt bath pot cleaning from metal heat treating operations.
- F012 Quenching wastewater treatment sludges from metal heat treating operations in which cyanides are used in the process.
- F013 Wastewater treatment sludges from the chemical conversion coating of aluminum
- F030 Multi-source Leachate
- K155 Organic wastes from production of carbamates and carbamoyl.
- K157 Wastewaters from the production of carbamates and carbamoyl oximes.
- K158 Filter/separation solids from production of carbamates/carbamoyl oximes.
- K159 Organics from the treatment of thiocarbamates.
- U003 Acetonitrile
- U004 Acetophenone
- U006 Acetyl chloride
- U007 Acrylamide
- U009 Acrylonitrile
- U011 Amitrole
- U012 Aniline
- U014 Auramine
- U017 Benzal chloride
- U018 Benz [a] anthracene

U019	Benzene
U021	Benzidine
U022	Benzo [a] pyrene
U028	1,2-Benzenedicarboxylic acid, [bis(2-ethyl-hexyl)] ester
U037	Chlorobenzene
U039	4-Chlorobenzene
U041	Epichlorohydrin
U043	Vinyl Chloride
U044	Chloroform
U047	beta-Chloronaphthalene
U048	o-Chlorophenol
U050	Chrysene
U052	Cresol
U053	Crotonaldehyde
U061	Dichloro diphenyl trichlorethane
U063	Dibenz [a,h] anthracene
U065	1,2-Dibromo, 3-Chloropropane
U067	Ethylene dibromide
U068	Dibromomethane
U069	Dibutyl phthalate
U070	o-Dichlorobenzene
U071	m-Dichlorobenzene
U072	p-Dichlorobenzene
U075	Dichlorodifluoromethane
U075	1,1-Dichloroethane
U077	Ethylene dichloride
U078	1,1-Dichloroethylene
U079	1,2-Dichloroethylene
U080	Methylene chloride
U081	2,4-Dichlorophenol
U083	1,2-Dichloropropane
U083	Diethyl phthalate
U091	3,3'-Dimethoxybenzidine
U093	Dimethylaminoazobenzene
U094	7,12-Dimethylbenz [a] anthracene
U095	3,3'-Dimethylbenzidine
U098	1,1-Dimethylhydrazine
U101	2,4-Dimethylphenol
U102	Dimethyl phthalate
U103	Dimethyl sulfate
U107	Di-n-octyl phthalate
U108	1,4-Dioxane
U115	Ethylene oxide
U118	Ethyl methacrylate
U119	Ethylmethanesulfonate
U120	Fluoranthene
U122	Formaldehyde

U125	Formic acid
U128	1,1,2,3,4,4-Hexachloro-1,3-butadiene
U129	gamma-Hexachlorocyclohexane
U130	Hexachlorocyclopentadiene
U131	Hexachloroethane
U133	Hydrazine
U136	Cacodylic acid
U138	Iodomethane
U140	Isobutyl alcohol
U141	Isosafrole
U147	Maleic anhydride
U148	Maleic hydrazide
U149	Malononitrile
U152	Methacrylonitrile
U153	Methanethiol
U155	Methyl chlorocarbonate
U157	3-Methylcholanthrene
U159	Methyl ethyl ketone
U160	Methyl ethyl ketone peroxide
U162	Methyl methacrylate
U165	Naphthalene
U166	1,4-Naphthoquinone
U167	1-Naphthalenamine
U168	2-Naphthalenamine
U169	Nitrobenzene
U170	p-Nitrophenol
U171	2-Nitropropane
U182	Paraldehyde
U185	Pentachloronitrobenzene
U187	Phenacetin
U188	Phenol
U190	Phthalic anhydride
U191	2-Picoline
U193	1,3-propane sulfone
U194	n-Propylamine
U195	Pyridine
U197	p-Benzoquinone
U200	Reserpine
U201	Resorcinol
U202	Saccharin and salts
U208	1,1,1,2-Tetrachloroethane
U209	1,1,2,2-Tetrachloroethane
U210	Tetrachloroethylene
U211	Carbon Tetrachloride
U218	Thioacetamide
U219	Thiourea
U220	Toluene

(664/09)

U221 Toluenediamine  
U223 Toluene diisocyanate  
U225 Bromoform  
U226 1,1,1-Trichloroethane  
U227 1,1,2-Trichloroethane  
U228 Trichloroethylene  
U236 Trypan blue  
U244 Thiram  
U246 Cyanogen bromide (CN)Br  
U273 Bendiocarb  
U279 Carbaryl  
U328 o-Toluidine  
U353 p-Toluidine  
U359 2-Ethoxyethanol  
U404 Triethylamine

## **Attachment 2:**

**Copy of EPA Acknowledgement of Consent  
Documents for Refractory Brick from Smelter**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

October 28, 2010

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

EPA Notice No.: 001230/8E/10

THOMAS C. SMITHGALL  
EASTMAN KODAK COMPANY  
1669 LAKE AVENUE BUILDING 56,  
ROCHESTER, NY US 14652-4543  
NYD980592497

Dear THOMAS C. SMITHGALL:

This is to acknowledge receipt of your notice, which was received by EPA on August 31, 2010, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice:

**Waste Stream 1: REFRACTORY BRICK FROM SMELTER**

Waste Description: REFRACTORY BRICK FROM SMELTER

EPA Waste Code: D007

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3077

Total Volume to be Exported: 100 US Tons - (2,000 pounds)

Estimated Frequency: 5 loads Annually

You may ship this waste to the following receiving facility:

XSTRATA CANADA CORPORATION BRUNSWICK SMELTER  
692 MAIN STREET,  
BELLEDUNE, NB, CA

Shipments may occur during the period from October 26, 2010, to October 21, 2011.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart E - Exports of Hazardous Waste.

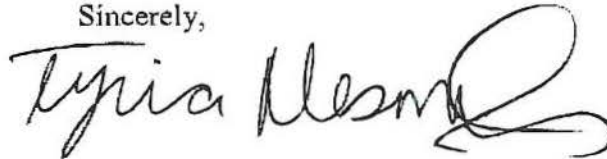
1. If the major terms of the original notice should change, you must renotify EPA. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: Notification to Export" prominently displayed on the front of the envelope. (§262.53(c))
2. The hazardous waste manifest for each shipment must identify the point of departure from the United States in Item 16. (§262.54(c))
3. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (§262.54(h))
4. You must provide the transporter with an additional copy of the manifest for delivery to the U.S. Customs official at the point the hazardous waste leaves the United States in accordance with §263.20(g)(4). (§262.54(i))
5. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty-five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; and the waste is returned to the United States. (§262.55)

6. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, (§262.56)

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Tyria Nesmith, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number 202-564-4369, fax number , [nesmith.tyria@epa.gov](mailto:nesmith.tyria@epa.gov).

Sincerely,



*For* Robert G. Heiss, Director  
International Compliance Assurance Division  
Office of Federal Activities

## **Attachment 3:**

### **Certification for Waste Minimization Activities\***

\*As Required by The New York State Solid and Hazardous Waste Law §27-0908, an Annual Hazardous Waste Reduction Plan (HWRP) is submitted annually by July 1<sup>st</sup> of each year.

The HWRP for Kodak Park will be submitted for calendar year 2010 (January 1, 2010 – December 31, 2010) by July 1, 2011 to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials - Bureau of Hazardous Waste Regulation.